REMARKS

Claims 1, 4, and 16-20 and 21-23 remain for reconsideration. Claims 2, 3, and 5-15 were previously cancelled.

Applicants note with appreciation the <u>withdrawal</u> of the previous grounds of rejection under 35 U.S.C. § 103(a) based on the combination of U.S. Patent 6,049,602 to Foladare in view of U.S. Patent 5,884,032 to Batemen and further in view of U.S. Patent 5,721,770 to Kohler.

Applicant's further note with appreciation the <u>withdrawal</u> of previous grounds of rejection based on Bateman in view of U.S. Patents 5,742,675 to Kilander further in view of 6,614,896 to Rao.

Applicants continue to overcome grounds of rejection in this case only to be presented with new art and rejections in subsequent Office Actions. In the present Office Action, all pending claims stand rejected on newly presented grounds. Specifically, all claims 1, 4, 16-17, and 21-23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,771,760 to Vortman in view of U.S. Patent 5,742,675 to Kilander. In

addition, claims 18-20 stand rejected over Vortman and Kilander, as above,

further in view of Bateman (previously of record).

These rejections are respectfully traversed based on the following

discussion.

Briefly, embodiments of the present invention are directed to providing

customer service support and, more particularly, to a call back system wherein

the customer does not have to wait on hold to speak to an agent (e.g., customer

service representative).

As discussed in the application, many older customer call centers still

in use do not have call-back or web capabilities (page 5, lines 10-15). Thus,

the customer must wait on hold for the next available agent. It is very costly to

upgrade these call centers.

As shown in Figure 7, embodiments of the present invention provide a

telephony server which can cost effectively provide non-call back call centers

with call back capabilities without need of costly upgrades. When a customer

calls for service or requests service via a web page, the customer provides a

call back phone number and may specify a particular problem. The call back

numbers and corresponding problems are stored in a telephony server. The

telephony server then calls the call center and waits for an agent (rather than

the customer waiting on hold for the agent). In addition, the server may

convert information about the customer into DTMF signals which is

understood by the call center prompts. When an agent answers, the agent

enters his/her ID, also via DTMF, such that the telephony server recognizes the

agent as available. The telephony server can then call back the customer and

bridge the call between the customer and the available agent. The server may

also match the available agent having expertise with a particular problem to a

particular call-back request. In this manner, the agent with the appropriate

skill set to solve the customer's particular problem may be selected to deal

with the customer.

All claims as presented include the feature or functionality of the

telephony server for detecting when an agent is available when the agent enters

their DTMF identification thus providing a call back center <u>not having call-</u>

<u>back capabilities</u> with call-back capabilities.

This argument was previously persuasive to overcome all previous

grounds of rejection.

Again, the primary reference to Vortman that the Examiner has relied

upon for now teaching "a call center not having callback capabilities" is

incorrect. Indeed the call center of <u>Vortman in fact already has call back</u>

<u>capabilities</u>. Column 2, lines 29-30 indicates that Vortman is directed to

"provide <u>improved</u> callback capabilities for call centers". One cannot

"improve" upon callback capabilities if callback capabilities do not already

exist.

The Examiner relies on Kilander simply a call agent entering DTMF as a means to identify the agent. However, again, this is not the case. The Examiner refers to column 6, lines 12-32 for this teaching. However, column 6, line 31 clearly states that the agent signals their availability by entering a command on the agents computer and sending it over a data link. This is clearly not DTMF (i.e. telephone dialing touch tones).

Bateman, previously of record is now relied upon for teaching initiating a co-browsing session. As previously noted in earlier Remarks, the call center in Bateman appears to already have call-back capabilities and regardless of whether or not it has co-browsing capabilities does not make up for this defect in Vortman and Kilander.

In short, embodiments of the present invention provide for a call back center not having call-back capabilities with call-back capabilities. Neither Vortman nor Kilander nor Bateman teach or suggest such a system. Volander and Bateman's call centers already have call back capabilities. Kilandar does not have call-back capabilities at all. Thus, the combination of these three references cannot make a case of *prima facie* obviousness.

As amended, independent claim 1 recites "connecting a telephony server between a user station and a call center not having call back capabilities via a telephone switching network, the call center in communication with at least one agent station... the telephony server calling back the user station and

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bridging a call back between the user station and the available agent..."
(emphasis added).

Independent clam 16 recites "the <u>telephony server bridging a call-back</u> from the available agent to the customer using the stored phone number corresponding to the problem" (emphasis added).

Finally, independent claim 21 recites "a call center to connect an incoming call to an agent telephone, <u>the call center being without call-back</u> <u>capabilities</u>;

<u>a telephony server comprising</u>:

a receiver for receiving a request for a call-back from a user over the internet; a dual tone multi frequency <u>(DTMF) generator for encoding user</u> <u>information into DTMF commands understood by the call center</u>; a transmitter to <u>call the call center over the telephone network providing the DTMF</u> <u>commands</u>; a <u>DTMF detector for receiving a DTMF string entered by an agent</u> answering the agent telephone to identify that the agent is available; and <u>a</u> <u>bridge for calling back the user to connect the available agent to the user</u>" (emphasis added).

The above features recited in the claims are not taught or suggested by the prior art of record. As such, it is respectfully requested that the outstanding rejections be withdrawn.

In view of the foregoing, it requested that the application be

reconsidered, that claims 1, 4, and 16-20 and 21-23 be allowed and that the

application be passed to issue. Please charge any shortages and credit any

overcharges to Intel's Deposit Account number 50-0221.

Respectfully submitted,

Date: August 19, 2005   /Kevin A. Reif/

Kevin A. Reif
Reg. No. 36,381

INTEL
LF1-102
4050 Lafayette Center Drive
Chantilly, Virginia 20151
(703) 633-6834

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